

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of Core Communications, Inc. for)	
Forbearance under 47 U.S.C. § 160(c) from)	WC Docket No. 06-100
Rate Regulation Pursuant to § 251(g) and for)	
Forbearance from the Rate Averaging and)	
Integration Regulation Pursuant to § 254(g))	

**REPLY OF CORE COMMUNICATIONS, INC. TO
QWEST COMMUNICATIONS INTERNATIONAL INC.'S
COMMENTS ON APPLICATION FOR REVIEW**

Core Communications, Inc. (“Core”) hereby files its reply to Qwest Communications International Inc.’s (“Qwest’s”) comments on Core’s March 28, 2007 Application for Review (“Application”) in the above-captioned proceeding.

Qwest is the only party that filed any papers in response to Core’s Application. Rather than file an “opposition” to Core’s Application as prescribed by the Commission’s rules, 47 C.F.R. § 1.115(d) (“Opposition to the application shall be filed within 15 days ...”), Qwest styled its papers as “comments,” apparently because “Qwest submits that **the Commission should** take [Core’s] ... delegated authority argument seriously and **re-issue the extension** within the original [*i.e.*, 12 month] time deadline.” Qwest Comments at 4 (emphasis added). To the extent the Commission decides to follow that Qwest advice, the result would be a grant of Core’s Application, not a denial as Qwest elsewhere suggests. ***Id.*** Indeed, in Core’s Application, one possible form of relief suggested by Core was a Commission (rather than a Bureau) order extending the forbearance deadline and setting forth a reasoned explanation as to why an extension of the deadline is necessary within the meaning of section 10. Application at

12. Thus, Qwest agrees that the Bureau had no authority to grant the Commission a section 10 extension and that the Bureau exceeded its authority in issuing the extension order.

Unfortunately, however, that is where the agreement between Core and Qwest ends. Without analysis or explanation, Qwest submits that the Commission can extend the forbearance deadline for any reason at all, including a “busy Commission schedule,” and that the Commission has no obligation to explain why an extension is “necessary,” Qwest Comments at 3, even though Congress included that requirement expressly in section 10. Core’s Application provided extensive analysis and citations describing why the Commission may not construe Congress’ “necessary” directive in a way that makes it devoid of content. Application at 7-11. Qwest, however, makes no effort to distinguish or even address Core’s analysis of section 10’s “necessary” standard and the Commission’s obligation to give it meaning. As a result, Qwest offers nothing that warrants a response, and Core reiterates and incorporates the arguments contained in its Application in this reply.

For all of these reasons, the Commission should grant Core’s Application.

Respectfully submitted,

/s/

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April 20, 2007

WCSR 3594163v1

CERTIFICATE OF SERVICE

I, Edilma M. Carr, do hereby certify that I have caused the foregoing "Reply of Core Communications, Inc. to Qwest Communications International Inc.'s Comments on Application for Review" to be: 1) filed with the FCC, via its Electronic Comment Filing System in WC Docket No. 06-100; 2) served, via email on the FCC's duplicating contractor, Best Copy and Printing, Inc. at fcc@bcpiweb.com; and 3) served via First Class United States Mail, postage prepaid, on the parties listed on the following service list.



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April 20, 2007

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